

Chemical Waste Management of the Northwest

17629 Cedar Springs Lane Arlington, OR 97812 (541) 454-2030 phone (541) 454-3247 fax

July 12, 2012

Elizabeth Druback
Eastern Region Manager
Hazardous Waste Program
Oregon Department of Environmental Quality
400 E Scenic Dr., Suite 2-307
The Dalles, OR 97058

RE: Chemical Waste Management of the Northwest, Inc. (CWMNW)

Permit #ORD 089 452 353

Request for Approval to Treat Water Reactive Wastes

Dear Ms. Druback:

Per permit condition IV.C.2. CWMNW requests the Oregon Department of Environmental Quality's approval to accept and treat thirty-two, 110-gallon drums of zirconium grinding swarf, at CWMNW. The waste profile accompanies this request (OR321327). The waste drums contain grinding swarf produced during the finishing of zirconium alloy plates at the ATI Precision Finishing facility in Pennsylvania. The swarf contained in the drums includes metal fines or threads, and small particles of the grinding media.

The waste will be treated by deactivation in the stabilization bins. Any underlying hazardous constituents that need treatment will also be stabilized.

Treatment of this water reactive waste material will be conducted using procedures outlined in the *Stabilization/Chemical Treatment Plan*, and modification required for insuring the health and safety of employees and contractors.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Please call me with questions or comments at (541) 454-3201.

Sincerely,

Samir M. Jiries

Environmental Protection Manager

Same M. Jim -

cc: Gary Fisher, District Manager, CWMNW

Rich Duval, ODEQ, Pendleton



Waste Management Profile "

Requested Facility: Chemical Waste Management (Hazardous Waste Facility)		☐ Unsure Profile Number: OR321319		
\square Check if there are multiple generator locations. Att	ach locations.	Renewal? Original Profile Number		
A. GENERATOR INFORMATION (MATERIAL ORIGIN)		B, BILLING INFORMATION	Ø SAME AS GI	NERATOR
1. Generator Name: ATI Wah Chang		1. Billing Name: ATI Wah Chang		
2. Site Address; 1600 NE Old Salem Rd		2. Billing Address: 1600 NE Old Saler	n Rd	
(City, State, ZIP) Albany OR 97321		(City, State, ZIP) Albany OR 9732	1	
3. County: Linn		3. Contact Name: Frank Hamilton		
4. Contact Name: Frank Hamilton		4. Email: frank.hamilton@atimetals.com		*
5. Email: frank.hamilton@atimetals.com		5. Phone: (541) 926-4211	•	
6. Phone: (541) 926-4211 7. Fax: (541) 924		7. WM Hauled?	☐ Ye	s 🗹 No
	D N/A	8. P.O. Number: <u>218129</u>		
9. State ID:	Ø N/A			
C. MATERIAL INFORMATION		D. REGULATORY INFORMATION	,	
1. Common Name: Zeconium grinding swart		1. EPA Hazardous Waste?	☑ Ye	s* 🗖 No
Describe Process Generating Material: Metal Working - See Attached	☑ See Attached	Code:	· · · · · · · · · · · · · · · · · · ·	
metal vvorking - See Attached		2. State Hazardous Waste?	☐ Ye	s ⊠ No
		Code:		
		3. Excluded waste under 40 CFR 29		s* ☑ No
		4. Contains Underlying Hazardous C		s* □ No
Material Composition and Contaminants:	✓ See Attached	5. Contains benzene and subject to		
1. Zerconium	90-100 %	6. Facility remediation subject to 4		s* Ed No
2. Hafahan	0-5 %	7. CERCLA or State-mandated clea	:n-up? ☐ Ye	s* ⊠íNo
3. Notium 4. Tin	0-3 %	8. NRC or State-regulated radioact	ive or NORM waste? 🚨 Ye	s* ⊠ÍNo
7. 141	≥100%	*If Yes, see Addendum (page 2) f	or additional questions ar	nd space.
3. State Waste Codes;	<u> </u>	9. Contains PCBs? → If Yes, answe	era bando. 🔲 Ye	s Ø No
4. Color: Varies - See Attached		a. Regulated by 40 CFR 761?	,	s 🗆 No
5. Physical State at 70°F: ☐ Solid ☐ Liquid ☑ Ot	her: solid w/liquids	b. Remediation under 40 CFR 7		s 🗆 No
6. Free Liquid Range Percentage: 25 to 35		c. Were PCB imported into the		s 🗆 No
7. pH; 7 to 11	□ N/A (Solid)	10. Regulated and/or Untreated		
8. Strong Odor: ☐ Yes ☑ No Describe:		Medical/Infectious Waste?	□ Ye	s SZÍNo
9. Flash Point: □ <140°F □ 140°-199°F □ ≥200		11. Contains Asbestos?	Friable 🚨 Yes: Non-Friabl	e 🗹 No
E. ANALYTICAL AND OTHER REPRESENTATIVE INFORMATION	ис	F. SHIPPING AND DOT INFORMATION		
1. Analytical attached	✓ Yes	1. 🗹 One-Time Event 🛭 Repeat B		
Please identify applicable samples and/or lab report	s:	2. Estimated Quantity/Unit of Mea	sure: 32	
See Allached		🖸 Tons 🖾 Yards 💋 Drums 🕻	🗆 Gallons 🕒 Other:	
		3. Container Type and Size: 110-gal	overpack	
		4. USDOT Proper Shipping Name:		□ N/A
2. Other information attached (such as MSDS)?	☑ Yes	RQ, UN 1358, Waste Zirconrum Powder, wetted, 4.1,	PGW	
G. GENERATOR CERTIFICATION (PLEASE READ AND CERTIF By signing this Waste Management Profile, I hereby certify that all and that all relevant information necessary for proper material cha derived from a sample that is representative as defined in 40 CFR changes in the process or new analytical) will be identified by the C	information submitted racterization and to ide 261 - Appendix 1 or by	ntify known and suspected hazards has been rusing an equivalent method. All changes occ	provided. Any analytical data atta turring in the character of the mai	ached was terial (i.e.,
If I am an agent signing on behalf of the Generator, I have c Generator that information contained in this Profile is accur		Certification	1 Signature	
Name (Print); Ryan Bodily Dat	te: 05/07/2012	Ì		
Title: Environmental Mgr				1
Company: ATI Wah Chang		RaDoll		



Waste Management Profile Addendum



Only complete this Addendum if prompted by responses on Waste Management Profile (page 1) or to provide additional information. Sections and question numbers correspond to Waste Management Profile.

Profile Number: OR321319

SECTION C	
Describe Process Generating Material (Continued from page 1):	If more space is needed, please attach additional pages.
Material Composition and Contaminants (Continued from page 1):	If more space is needed, please attach additional pages.
5. Chromium	0-1 %
6. Titanium	0-1 %
7. Aluminum	0-1 %
8. Vanadium	0-1 %
9.	
10.	
	≥100%
SECTION D	
Only questions with a "Yes" response on Waste Management Profile (page 1	1) need to be answered here
EPA Hazardous Waste	, need to be districted field.
a. Please list all USEPA listed and characteristic waste code numbers:	
A Trade has an ober tribated and engladed before code harmons.	
b. Is the material subject to the Alternative Debris standards (40 CFR 268.45)?	☐ Yes �� No
c. Is the material subject to the Alternative Soil standards (40 CFR 268.49)? →	
d. Is the material exempt from Subpart CC Controls (40 CFR 264.1083 and 265	
→ If Yes, please select one of the following:	
☐ Waste has been determined to be LDR exempt [265.1083(c)(4) and 2	65 1084(c)(4)) based on the fact that it meets all applicable
organic treatment standards (including UHCs for D-coded characteristi	
☐ Waste does not qualify for a LDR exemption, but the average VOC at the	
was based on analytical testing (upload copy of analysis) or generator k	
2. State Hazardous Waste → Please list all state waste codes:	
3. Excluded Waste \rightarrow Please select which of the following categories apply to your	r material:
☐ Delisted Hazardous Waste ☐ Excluded Waste under 40 CFR 261.4	→ Specify Exclusion:
☐ Treated Hazardous Waste Debris ☐ Treated Characteristic Hazardous Was	ste → If checked, complete question 4.
 Underlying Hazardous Constituents → Please list all Underlying Hazardous Cons Chromium is present in the metal, but is not expected to be present above the UTS. See Attact 	tituents:
Chromium is present in the metal, but is not expected to be present above the UTS. See Attack	1ed.
5. Benzene NESHAP → Please include benzene concentration and percent water/m	noisture in chemical composition.
a. Are you a TSDF? $ ightarrow$ If yes, please complete Benzene NESHAP questionnaire.	If not, continue.
b. What is your facility's current total annual benzene quantity in Megagrams?	□<1 Mg □1-9.99 Mg □≥10 Mg
c. Is this waste soil from remediation at a closed facility?	☐ Yes ☐ No
d. Has material been treated to remove 99% of the benzene or to achieve <10 p	pmw?
e. Is material exempt from controls in accordance with 40 CFR 61.342?	☐ Yes ☐ No
→ If yes, specify exemption:	
f. Based on your knowledge of your waste and the BWON regulations, do you be	elieve that this waste stream is subject to
treatment and control requirements at an off-site TSDF?	
6. 40 CFR 63 GGGGG → Does the material contain <500 ppw VOHAPs at the point of the	
7. CERCLA or State-Mandated clean up → Please submit the Record of Decision or	r other documentation to assist others in the evaluation for
proper disposal.	- 1 - 612
8. NRC or state regulated radioactive or NORM Waste → Please identify Isotopes a	ana puyg:

Attachment for Profile Number OR321319

The waste proposed for treatment and disposal under OR321319 consists of 32 drums of material (the "Waste Drums"). In December 2011, the Waste Drums were part of a 40-drum shipment of waste from ATI Wah Chang's ("ATI") facility in Albany, Oregon to the Heritage-WTI, Inc. ("WTI") facility (EPA ID OHD98063541) located at 1250 St. George St. in East Liverpool, Ohio (the "WTI Facility"). The Waste Drums are currently located at the WTI Facility and will be offered for transport from the WTI Facility to Chemical Waste Management of the Northwest ("CWMNW"). The Waste Drums will be prepared for shipment from the WTI Facility and transported to CWMNW by Clean Harbors Environmental Services, Inc. ("Clean Harbors").

The Waste Drums contain grinding swarf produced during the finishing of zirconium alloy plates at the ATI Precision Finishing facility in Pennsylvania. The swarf produced in the zirconium plate finishing process, and contained in the Waste Drums, includes metal fines or threads, and small particles of the grinding media (minerals such as garnet and silica). The swarf is generally silver or grayish, but the color of the material is not consistent or uniform. Considering the types of zirconium alloy plates finished at the ATI Precision Finishing facility, and the fact that the facility also finishes titanium alloy plates, ATI believes the metals in the Waste Drums consist primarily of zirconium, with limited amounts of other metals. ATI estimates that the metals in the Waste Drums may include: zirconium (90-100%), hafnium (0-5%), niobium (0-3%), tin (0-2%), iron (0-1%), chromium (0-1%), titanium (0-1%), aluminum (0-1%), and vanadium (0-1%). During the finishing process, the plates and swarf are saturated with a solution containing water and Cal-Grind 1541® (see attached MSDS), a water soluble coolant and rust inhibitor (at 3 – 5% by volume). The Waste Drums are expected to contain between 0 – 25% of that solution.

The Waste Drums also contain a water soluble oil, Hangsterfer's S-500® CF (see attached MSDS), that ATI Wah Chang added to the drums before they were shipped to the WTI facility. The Waste Drums are expected to contain 0 – 25% of this soluble oil. At the time of their shipment to the WTI facility, the Waste Drums consisted of 55-gallon steel drums overpacked in 85-gallon steel salvage drums.

WTI alleges that one of the 40 drums of waste that ATI Wah Chang had shipped in December 2011 to the WTI Facility was involved in a fatal accident there on December 17, 2011. At the time of the accident, WTI employees were opening one of the drums, draining it of liquid and repackaging its contents into smaller loads. We understand from WTI that the material in the drum ignited while WTI workers were performing those tasks, creating an intense fire in the drum. One worker was fatally burned in the accident, and another was also badly burned.

Although ATI does not possess many details regarding the accident, WTI believes the drum involved in the accident may have contained a pocket of fine, dry, white powder. Because the accident involved an intense fire, WTI suggested to ATI that material may have been dry, powdered zirconium. ATI does not understand how the drum involved in WTI's accident—or any of the other Waste Drums—could contain dry zirconium powder. The process at the ATI Precision Finishing facility that produced the grinding swarf should not produce any dry powder,

and the material in the Waste Drums should be wet with water soluble oil and coolant / rust inhibitor solution.

However, because of the gravity of the accident at WTI, and in the interests of safety, each of the Waste Drums is presumed to contain dry zirconium powder for the purpose of this waste profile (OR321319).

Prior to shipment from the WTI facility, CHES will prepare each of the Waste Drums for shipment using the following technique. CHES will open each 85-gal drum and fill it with a 37% solution of sodium silicate (MSDS attached) to a level covering the inner 55-gal drum. CHES will then penetrate the lid of the inner 55-gal drum and add additional sodium silicate solution to the inner drum. ATI estimates that the Waste Drums may contain 0 – 30% of the sodium silicate solution. All told, ATI estimates that the volume of free liquids in the drums could range between 25 – 35%. Before shipping the drums to CWMNW, CHES will close each 85-gal drum and place each drum into a 110-gal overpack.

For purposes of transportation and disposal, ATI has tentatively characterized the Waste Drums as D001 ignitable and D003 reactive hazardous waste. Based on its testing of zirconium grinding swarf and its knowledge of the processes that produce that material, ATI believes that the material in the Waste Drums was not a hazardous waste when it was shipped to the WTI Facility for disposal (see attached Veolia profile 434443). However, in response to the accident at the WTI Facility involving this waste and WTI's allegations about the accident, we are profiling the Waste Drums to CWMNW under the D001 and D003 hazardous waste codes. In addition, we request that the Waste Drums be managed for disposal as if they each could contain dry zirconium powder.

WTI will not authorize ATI to collect or analyze samples from the Waste Drums before the drums are shipped to CWMNW. Accordingly, to provide CWMNW with information to evaluate the relative toxicity of the material in the Waste Drums, we collected samples of other zirconium grinding swarf produced by the ATI Precision Finishing facility from zirconium alloy plates similar to the plates used to produce the swarf in the Waste Drums. The TCLP analytical results for those samples, with UHC data, are attached. Based on those data, and our knowledge of the ATI Precision Finishing facility process that produces zirconium grinding swarf, ATI does not believe that the material in the Waste Drums will possess the hazardous characteristic of toxicity.



Chemical Waste Management of the Northwest

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Eastern Region Manager
Hazardous Waste Program
Oregon Department of Environmental Quality
400 E Scenic Dr., Suite 2-307
The Dalles, OR 97058

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Permit #ORD 089 452 353

Request for Approval to Treat Water Reactive Wastes

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Treatment of this water reactive waste material will be conducted using procedures outlined in the *Stabilization/Chemical Treatment Plan*, and modification required for insuring the health and safety of employees and contractors.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Please call me with questions or comments at (541) 454-3201.

Sincerely,

Samir M. Jiries

Environmental Protection Manager

Summer M. Sim -

cc: Gary Fisher, District Manager, CWMNW

Rich Duval, ODEQ, Pendleton



Waste Management Profile "

Requested Facility: Chemical Waste Management (Hazardous Waste Facility)		☐ Unsure Profile Number: OR321319		
☐ Check if there are multiple generator locations. A		☐ Renewal? Original Profile Number:		
A. GENERATOR INFORMATION (MATERIAL ORIGIN) 1. Generator Name: ATI Wah Chang		B. BILLING INFORMATION S SAM 1. Billing Name: ATI Wah Chang	E AS GENE	ERATOR
2. Site Address: 1600 NE Old Salem Rd		2. Billing Address: 1600 NE Old Salem Rd		
(City, State, ZIP) Albany OR 97321		(City, State, ZiP) Albany OR 97321		
3. County: Linn		3. Contact Name: Frank Hamilton		
4. Contact Name: Frank Hamilton	•	4. Email: frank.hamilton@atimetals.com		
5. Email; frank.hamilton@atimetals.com		5. Phone: (541) 926-4211 6. Fax: (541) 924-6	874	
6. Phone: (541) 926-4211 7. Fax: (541) 93	24-6874	7. WM Hauled?	☐ Yes	
	· -	8. P.O. Number: 218129	C 162	MAI NO
		8. P.O. NUMBER, 210120		
9. State ID:	¼ N/A			
C. MATERIAL INFORMATION		D. REGULATORY INFORMATION	- 4	
1. Common Name: Zeconlum grinding swarf		1. EPA Hazardous Waste?	⊠ Yes*	□ No
Describe Process Generating Material:	☑ See Attached	Code:		
Metal Working - See Attached		2. State Hazardous Waste?	Yes	⊠ No
		Code:		
		3. Excluded waste under 40 CFR 261.4 (a) or (b)?	☐ Yes*	•
		4. Contains Underlying Hazardous Constituents?	☑ Yes*	
Material Composition and Contaminants:	☑ See Attached	5. Contains benzene and subject to Benzene NESHAP?		
1, Zeconium	90-100 %	6. Facility remediation subject to 40 CFR 63 GGGGG?	☐ Yes*	⊠ No
2. Harnium	0-5 %	7. CERCLA or State-mandated clean-up?	🗘 Yes*	⊠ No
3. Notium	0-3 %	8. NRC or State-regulated radioactive or NORM waste?	☐ Yes*	⊠ No
4. ты	≥100%	*If Yes, see Addendum (page 2) for additional quest	ions and	space.
3. State Waste Codes:	121 N/A	9. Contains PCBs? → If Yes, answer a, b and c.	☐ Yes	₽Î N∧
4. Color: Varies - See Attached	W N/A	a. Regulated by 40 CFR 761?	☐ Yes	
5. Physical State at 70°F: Solid Liquid 20 C	Othor: sold wilguids	b. Remediation under 40 CFR 761.61 (a)?	☐ Yes	
6. Free Liquid Range Percentage: 25 to 35		c. Were PCB imported into the US?	☐ Yes	
7. pH: 7 to 11		10. Regulated and/or Untreated	C 162	CI NO
8. Strong Odor: Yes No Describe:		Medical/Infectious Waste?	Yes	⊠ No
9. Flash Point: □ <140°F □ 140°−199°F □ ≥20		11. Contains Asbestos?	-Friable	⊠ No
E. ANALYTICAL AND OTHER REPRESENTATIVE INFORMAT		F. SHIPPING AND DOT INFORMATION		
1. Analytical attached	≨ 2 Yes	1. 2 One-Time Event Repeat Event/Ongoing Busin	ess	
Please identify applicable samples and/or lab repo	rts:	2. Estimated Quantity/Unit of Measure: 32		
		☐ Tons ☐ Yards ☐ Drums ☐ Gallons ☐ Other	· 	
		3. Container Type and Size: 110-gal overpack		
		4. USDOT Proper Shipping Name:		□ N/A
2. Other information attached (such as MSDS)?	⊠ Yes	RQ, UN 1358, Waste Zirconium Powder, wetted, 4.1, PGIt		
and that all relevant information necessary for proper material cl derived from a sample that is representative as defined in 40 CF	all information submitted haracterization and to ide R 261 - Appendix 1 or by	in this and all attached documents contain true and accurate description intify known and suspected hazards has been provided. Any analytical yusing an equivalent method. All changes occurring in the character of sed to Waste Management prior to providing the material to Waste Ma	data attach Tthe materi	ied was al (i.e.,
If I am an agent signing on behalf of the Generator, I have Generator that information contained in this Profile is acc		Certification Signature		
Name (Print): Ryan Bodily D	ate: _05/07/2012			
Title: Environmental Mgr				
Company: ATI Wah Chang		R. Doll		



Waste Management Profile Addendum



Only complete this Addendum if prompted by responses on Waste Management Profile (page 1) or to provide additional information. Sections and question numbers correspond to Waste Management Profile.

Profile Number: OR321319

SECTION C	
Describe Process Generating Material (Continued from page 1):	If more space is needed, please attach additional page
Material Composition and Contaminants (Continued from page 1):	If more space is needed, please attach additional page
5. Chromlum	0-1 %
6. Titanium	0-1 %
7. Aluminum	0-1 %
8. Vanadlum	0-1 %
9.	
10. 4, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1,	
	≥100%
SECTION D	
Only questions with a "Yes" response on Waste Management Profile	(page 1) need to be answered here.
1. EPA Hazardous Waste	
a. Please list all USEPA listed and characteristic waste code numbers:	
	1,1,0,0,0,0,0,0,0,0,0,0,0,0,0,0,0,0,0,0
b. Is the material subject to the Alternative Debris standards (40 CFR 26	8.45)?
c. Is the material subject to the Alternative Soil standards (40 CFR 268.4	·
d. Is the material exempt from Subpart CC Controls (40 CFR 264,1083 a	·
→ If Yes, please select one of the following:	
• ,	and 265.1084(c)(4)] based on the fact that it meets all applicable
organic treatment standards (including UHCs for D-coded chara	acteristic wastes) or a Specified Technology has been utilized.
	OC at the point of origination is <500 ppmw and this determination
was based on analytical testing (upload copy of analysis) or gen	
2. State Hazardous Waste → Please list all state waste codes;	
3. Excluded Waste → Please select which of the following categories apply	to your material:
☐ Delisted Hazardous Waste ☐ Excluded Waste under 40 CFF	
	ous Waste → If checked, complete question 4.
 Underlying Hazardous Constituents → Please list all Underlying Hazardou Chromium is present in the metal, but is not expected to be present above the UTS. S 	
5. Benzene NESHAP $ ightarrow$ Please include benzene concentration and percent v	water/moisture in chemical composition.
a. Are you a TSDF? → If yes, please complete Benzene NESHAP question	naire. If not, continue.
b. What is your facility's current total annual benzene quantity in Megagra	ams? □<1 Mg □ 19.99 Mg □≥10 M
c. Is this waste soil from remediation at a closed facility?	☐ Yes ☐ N
d. Has material been treated to remove 99% of the benzene or to achieve	2 <10 ppmw? ☐ Yes ☐ N
e. Is material exempt from controls in accordance with 40 CFR 61.342?	☐ Yes ☐ N
→ If yes, specify exemption:	
f. Based on your knowledge of your waste and the BWON regulations, do treatment and control requirements at an off-site TSDF?	you believe that this waste stream is subject to
6. 40 CFR 63 GGGGG → Does the material contain <500 ppw VOHAPs at	the point of determination?
 CERCLA or State-Mandated clean up → Please submit the Record of Dec proper disposal. 	
3. NRC or state regulated radioactive or NORM Waste → Please identify Iso	otopes and pCi/q:
	1 F - 7 D

Attachment for Profile Number OR321319

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and the material in the Waste Drums should be wet with water soluble oil and coolant / rust inhibitor solution.

However, because of the gravity of the accident at WTI, and in the interests of safety, each of the Waste Drums is presumed to contain dry zirconium powder for the purpose of this waste profile (OR321319).

Prior to shipment from the WTI facility, CHES will prepare each of the Waste Drums for shipment using the following technique. CHES will open each 85-gal drum and fill it with a 37% solution of sodium silicate (MSDS attached) to a level covering the inner 55-gal drum. CHES will then penetrate the lid of the inner 55-gal drum and add additional sodium silicate solution to the inner drum. ATI estimates that the Waste Drums may contain 0 – 30% of the sodium silicate solution. All told, ATI estimates that the volume of free liquids in the drums could range between 25 - 35%. Before shipping the drums to CWMNW, CHES will close each 85-gal drum and place each drum into a 110-gal overpack.

For purposes of transportation and disposal, ATI has tentatively characterized the Waste Drums as D001 ignitable and D003 reactive hazardous waste. Based on its testing of zirconium grinding swarf and its knowledge of the processes that produce that material, ATI believes that the material in the Waste Drums was not a hazardous waste when it was shipped to the WTI Facility for disposal (see attached Veolia profile 434443). However, in response to the accident at the WTI Facility involving this waste and WTI's allegations about the accident, we are profiling the Waste Drums to CWMNW under the D001 and D003 hazardous waste codes. In addition, we request that the Waste Drums be managed for disposal as if they each could contain dry zirconium powder.

WTI will not authorize ATI to collect or analyze samples from the Waste Drums before the drums are shipped to CWMNW. Accordingly, to provide CWMNW with information to evaluate the relative toxicity of the material in the Waste Drums, we collected samples of other zirconium grinding swarf produced by the ATI Precision Finishing facility from zirconium alloy plates similar to the plates used to produce the swarf in the Waste Drums. The TCLP analytical results for those samples, with UHC data, are attached. Based on those data, and our knowledge of the ATI Precision Finishing facility process that produces zirconium grinding swarf, ATI does not believe that the material in the Waste Drums will possess the hazardous characteristic of toxicity.



Department of Environmental Quality

Headquarters 811 SW Sixth Avenue Portland, OR 97204-1390 (503) 229-5696 FAX (503) 229-6124 TTY: 711

July 13, 2012

Peter D. Sax Stoel Rives, LLP 900 SW Fifth Portland, OR 97204

Re:

Public Records Request

ATI Wah Chang

Dear Mr. Sax:

The records you have requested on June 12, 2012, are enclosed. An invoice for DEQ's fees for compiling and printing the records will be sent under separate cover. If you have any questions, please call me at (503) 229-5950.

Sincerely,

Jeff Bachman

Office of Compliance and Enforcement

Enclosure

cc:

Brian Fuller, Western Region, Eugene Office, DEQ

Photocopy and Service Charges Oregon DEQ Business Office internal document 811 SW 6th Ave., Portland OR 97204-1390 Date requested: 6/12/12 Date copies made: 6/13/12 Office: **HQ-MSD** DEQ Staff contact: Jeff Bachman Phone: 503-229-5950 Billing: Other (COPY) If other, specify: Signed Public Records Request is attached. (Public Records Request is required for any job estimated at more than \$25) Requester's Name: Peter Sax Phone: 503-294-9801 Company: Stoel Rives LLP Address: 900 SW Fifth Ave., Suite 2600 City, State, Zip: Portland OR 97204 Records Requested (you may attach a preprinted list): attached Call when copies are ready Please mail Check if agency-wide response takes 15 minutes or less (no charge) ITEMS. EA . TOTAL Service charge for invoicing (\$5.00) \$5.00 Outsourced copies - attach documentation actual Copies made @ 25¢ ea. 750 copies @ \$0.25 \$187,50 Oversized copies @ 50¢ ea. copies @ \$0.50 \$0.00 Color copies @ \$1 ea. copies @ \$1.00 \$0.00 Archive retrieval charges: Standard: 1st box \$60, each add'l box \$12 Half-Day Rush: 1st box \$85, each add'| box \$15 RUSH: 1st box \$135, each add'l box \$15 Labor charge - hard copy reproductions 8.00 hrs @ \$30.00 \$240.00 Labor charge - electronic reproductions hrs @ \$40.00 \$0.00 Mailing costs (actual or estimated) Express mailing (actual or minimum of \$9) Other charges (Specify) \$0.00 TOTAL \$432.50 Method of payment: Cash – Receipt No. Check - Check No. Receipt No. Money Order No. Receipt No.

Waiver Amount

Invoice (\$5 service charge will be added)

Business Office – payment enclosed

Fee Waiver No.

ATTN:



500 S.W. Fifth Avenue, Suite 2600 Fortland, Oregon 97204 main 503.224.3380 fax 503.220.2480 www.stocl.com

July 6, 2012

Pister D, SAX Direct (503) 294-9801 pdsax@stocl.com

VIA UPS DELIVERY

Mr. Brian Fuller Manager Hazardous & Solid Waste Oregon Department of Environmental Quality 811 SW 6th Avenue Portland, OR 97204-1390

Re: Public Records Request

Dear Brian:

Thank you for your email response of July 3, 2012. Enclosed please find our approval of the cost estimate of \$455.00.

Thank you in advance for your assistance. Please contact me or my colleague Mark Morford (503-294-9259 or jmmorford@stoel.com) with any questions.

Very truly yours,

Peter D. Sax

PDS/dca Enclosure

JUL 1 1 2012

WESTERN REGION/EUGENE
DEPT ENVIRONMENTAL OUALITY

DEPARTMENT OF ENVIRONMENTAL QUALITY PUBLIC RECORDS REQUEST FORM Please send completed form to: deqlnfo@deq.state.or.us or fax to (503) 229-6124

Dato: June 12, 2012		
Requestor's Name: Poter Sax		Phone: <u>503,294,9801</u>
		Fax: <u>503.220,2480</u>
Company: Stool Rives LLP		
Address: 900 SW Fifth Aye.	Suite 2600	
Portland, OR 97204	<u> </u>	
Records Requested (please prin	• •	see attached letter
03 10 through 340-110-039 exempt material, supervisi	These costs may include the cost ing the inspection of records, copying	, according to the rules set forth in OAR 340-011- of locating records, reviewing records to delete grecords, certifying records and mailing records, or the Department was able to locate the requested
7/1-6/30 fiscal year), DBQ	will bill you for any costs associated	alvers at an amount of \$200 annually (based on the d with record retrieval, sorting, reviewing or copying ecords request costs are your responsibility.
My organization has a NOTE: Fee waivers do no	current fee waiver il	outside vendor (non-DEQ personnel).
My organization is a lo	cal, state or federal public/governme	intal entity acting in a public function.
NOTE: The agency reserves i	the right to charge for any Job based	l on criteria listed in OAR 34p-011-p380,
Signature		Date
requestor with a written notifice DEQ to proceed with making the	ation of the estimated amount of the later records available.	t of more than \$25, DEQ is required to provide the fee. The requestor must then confirm that they wan
DEQ estimate of job cost: , \$	455,00	
Requistor confirmation of rece	ipt of job estimate and authorization	to proceed with making records available.
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DEQ Staff Contact:	Telephone #;	-
Office:	ICIYaadawanta	rs, please identify Division:
:\Public Records Request Agreement.dots		DECEIVE JUL 11 2012
7,000,000		WESTERN REGIONIEUGENE DEPT ENVIRONMENTAL QUALITY

DEPARTMENT OF ENVIRONMENTAL QUALITY PUBLIC RECORDS REQUEST FORM Please send completed form to: deqinfo@deq.state.or.us or fax to (503) 229-6124

Date: June 12, 2012		
Requestor's Name: Peter Sax		Phone: <u>503.294.9801</u>
		Fax: <u>503.220.2480</u>
Company: Stoel Rives LLP		
Address: 900 SW Fifth Ave, Suite	2600	
Portland, OR 97204		
Records Requested Inlease print or a	ttach a proprinted list). Plages cas	attached letter
records requested (please print of a	tacit a preprinted fist). Ficase see	attached letter
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M I save to may the east of fulfilling	on this Dublic Decords Decords	ccording to the rules set forth in OAR 340-011-
0310 through 340-110-0390. The exempt material, supervising the including the cost of searching for	ese costs may include the cost of inspection of records, copying re	coording to the rules set forth in OAR 340-011- clocating records, reviewing records to delete ecords, certifying records and mailing records, the Department was able to locate the requested
records.	. 550 110 1	
IF YOU HAVE A FEE WAIVER, please note: DEQ caps all fee waivers at an amount of \$200 annually (based on the 7/1-6/30 fiscal year). DEQ will bill you for any costs associated with record retrieval, sorting, reviewing or copying above the \$200 threshold. Once the \$200 limit is reached, all records request costs are your responsibility.		
My organization has a current fee waiver #		
My organization is a local, state or federal public/governmental entity acting in a public function.		
NOTE: The agency reserves the right to charge for any job based on criteria listed in OAR 340-011-0380.		
Signature		Date .
Per ORS 192.440, for public records requests with an estimated cost of more than \$25, DEQ is required to provide the requestor with a written notification of the estimated amount of the fee. The requestor must then confirm that they want DEQ to proceed with making the records available. DEQ estimate of job cost: \$		
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requestor continuation of receipt of	joo estimate and authorization to	proceed with making records available.
Signature		· Date
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UPS billing number:	•	D-EX billing number:
THIS SPACE FOR OFFICE USE ONLY		
DEO Stoff Contact		
		Fax #:
Office:	If Headquarters,	please identify Division:



900 S.W. Filth Avenue, Suite 2600 Portland, Oregon 97204 main 503.224.3380 ka 503.220.2480 www.stocl.com

June 12, 2012

PETER D. SAX Direct (503) 294-9801 pdsax@stoel.com

VIA EMAIL AND CERTIFIED MAIL (RETURN RECEIPT REQUESTED)

Mr. Brian Fuller Manager Hazardous & Solid Waste Oregon Department of Environmental Quality 811 SW 6th Avenue Portland, OR 97204-1390

Re: Public Records Request

Dear Brian:

This letter is a request for information from the Oregon Department of Environmental Quality ("DEQ") under DEQ's Public Records Administrative Rule (OAR 340-011-0310 through 0390).

Specifically, I'm writing to request that DEQ provide me with electronic or paper copies of:

- all documents in DEQ's possession related to the disposal of waste, or recycling or other
 processing of materials from TDY Industries, LLC's (dba ATI Wah Chang) Albany,
 Oregon facility or ATI Precision Finishing LLC's Rochester, Pennsylvania facility at: (1)
 Heritage –WTI, Inc. ("WTI"), located in Liverpool, Ohio; and/or (2) AL Solutions Inc.,
 located in New Cumberland, West Virginia (referred to collectively as "the Facilities");
- all documents in DEQ's possession related to the transportation of waste or other materials from ATI Wah Chang to the Facilities, including without limitation, shipments transported by Veolia Environmental Services ("Veolia");
- any contracts or correspondence between Veolia and WTI; and
- all documents that relate to fires, accidents or other workplace incidents at either Facility.



Mr. Brian Fuller June 12, 2012 Page 2

I promise to pay reasonable fees that DEQ may incur in searching for and providing the requested information, even if the fees charged to provide the requested documents exceed \$25. Please contact me as soon as you receive this request to discuss the fees DEQ expects to incur in responding and to obtain my advance authorization to incur those fees.

I represent a private business and am seeking the requested documents for its use. I look forward to your response within 20 business days of your receipt of this request. If you deny this request in full or in part, please provide reasons why DEQ considers the requested record exempt, as required by OAR 340-011-0390. In addition, please release all reasonably segregable portions of the requested information not subject to an exemption.

Thank you in advance for your prompt consideration and assistance responding to this request. Please contact me or my colleague Mark Morford (503-294-9259 or jmmorford@stoel.com) with any questions.

Very truly yours,

Peter D. Sax

PDS/dea Enclosure

cc (via email):

Sarah Wheeler, DEQ Office of Compliance and Enforcement Susan Shewczyk, DEQ Hazardous Waste Inspector, Western Division . .



ATI Wah Chang 1600 Old Salem Road P.O. Box 460 Albany, OR 97321-0460 Tel: 541-926-4211 Fax: 541-967-6990 www.ATImetals.com

July 18, 2012

Mr. Brian Fuller Oregon Department of Environmental Quality, Western Region 750 Front Street NE, Suite 120 Salem, OR 97301-1039

Re: Zirconium Wastes

Dear Brian:

I am responding to your letter of June 13, 2012 in which you requested additional information about the zirconium wastes for which DEQ granted ATI Wah Chang a 30-day extension to the 90-day generator accumulation period. Thank you again for accommodating our request for the extension.

In your letter, you requested the following information about the wastes subject to the extension:

- 1. A list of the drums with weights.
- 2. A brief description of how the waste was generated.
- 3. A copy of the disposal manifest(s).

This letter provides the information you requested. The letter begins by describing how the wastes subject to the extension were generated. It then addresses your request for a list of the drum weights and disposal manifests.

Zirconium Fines Waste Descriptions

The wastes in question contain zirconium fines and are generated by four types of processes. Three of the four waste streams are from wet processes and generate wastes that we maintain in a wet condition; the other waste stream is dry and is maintained in a dry condition. The following paragraphs summarize the four waste streams:

A. Honing Sludge (Clean Harbors Profile CH 561515). Honing sludge is generated by high friction honing of zirconium tubes. During the honing process, metal fines are created by polishing from the inside of a seamless metal tube. The metal tubes being honed and the metal fines generated during the honing process are saturated with a heavy petroleum-based lubricant



Mr. Brian Fuller July 18, 2012 Page 2

called honing oil. This waste stream includes zirconium fines (it may also contain low concentrations of hafnium, niobium and titanium), abrasive media (such as garnet, silica, aluminum oxide, ceramics and adhesive polymers), honing oil and filter paper.

- B. Rotoclone Sludge: (Clean Harbors Profile CH 566614). Rotoclone sludge consists of fines generated by high friction metal sanding processes. The fines from the sanding processes are captured in an air pollution control device called a Rotoclone, which mixes the solid materials with water, settles out the solids and emits the cleaned exhaust gas. This waste stream includes zirconium fines (it may also contain low concentrations of hafnium, niobium and titanium), abrasive media (such as garnet, silica, aluminum oxide, ceramics and adhesive polymers) and water.
- C. Zirconium Fines from Other Wet Metal Finishing Processes: (Clean Harbors Profiles CH120512 & CH120512-1). Wah Chang generates zirconium fines from other metal finishing processes that use water-based coolant and lubricant. These processes include grinding, sawing and sanding and theyproduce fine particulate and thin shavings or ribbons. Wastes in this stream can have the consistency of gritty mud or gritty, wet felt. This waste stream includes zirconium fines (it may also contain low concentrations of hafnium, niobium and titanium), abrasive media (such as garnet, silica, aluminum oxide, ceramics and adhesive polymers), water and water-based coolant or lubricant (currently Hangsterfer's S-500 CF), filter paper, paper filter cartridges, and plastic bags containing small batches of the waste. At the direction of our disposal vendor, Clean Harbors Environmental Services, Inc. ("Clean Harbors"), decided drums containing this waste stream that do not include filter paper or paper filter cartridges are managed under profile CH120512. Drums that do contain filter paper or cartridges are managed under a separate profile, CH120512-1.
- D. Floor Sweepings (Clean Harbors Profile CH561493). This waste stream is generated by sweeping and other housekeeping tasks in the Powder Met Department. This department produces dry zirconium powder as a product. Routine housekeeping activities collect zirconium powder mixed with the sundry other dust and debris that collects on the floor and other surfaces in this department. This waste stream includes zirconium fines (it may also contain low concentrations of hafnium, niobium and titanium) and non-metallic dry, inert debris (such as dirt, ear plugs, paper cups, broken wooden pallets or used absorbent materials.

Mr. Brian Fuller July 18, 2012 Page 3

As you know, the wastes subject to the extension were repackaged by Clean Harbors for incineration between June 17- and 27, 2012. To prepare the wastes for incineration, Clean Harbors required that the wastes be repackaged into 30-gallon plastic drums containing no more than 100 lbs of metal per drum (not counting the weight of any non-metal waste inside). Given the relatively small amount of metal inside drums containing filter paper and filter cartridges, Clean Harbors decided to manage drums containing those wastes under a separate profile, CH120512-1, and authorized its personnel to repack those wastes into 30-gallon plastic drums holding up to 200 lbs (counting the weight of any metal and non-metal waste inside).

With the exception of the four drums of dry floor sweepings managed under CH561493, all of the 30-gallon plastic drums contained sodium silicate solution. Because the plastic drums, selected for incineration, were not rated for liquids, Clean Harbors decided to package all of the 30-gallon plastic drums into 55-gallon steel drums rated for liquids. Clean Harbors completed that work on July 13, 2012. All told, Clean Harbors packed 698 55-gallon steel drums containing wastes subject to the extension.

List of Drums, Weights and Manifest Copies

The attached spreadsheet (Attachment A) lists the 698 drums, their weights (as packed for transport) and their contents (as matched to the Clean Harbors profiles described above). Copies of the manifests that accompanied the drums during their shipment for disposal are attached (Attachment B).

As is reflected on the manifests, Wah Chang conservatively characterized the wastes subject to the 90-day generator accumulation extension as D001 ignitable and D003 reactive hazardous wastes. Based on its historical testing of similar wastes generated in its metal working processes, Wah Chang does not believe that these wastes are actually hazardous. Wah Chang intends to complete a thorough analysis of these wastes and the hazardous characteristics that they may or may not possess. Based on the results of that analysis, Wah Chang may reconsider whether future batches of these wastes should be managed as ignitable or reactive hazardous wastes.

Mr. Brian Fuller July 18, 2012 Page 4

Please let me know if you have additional questions about the wastes subject to the extension.

Sincerely,

Lee Weber

cc: Jim Denham

Lauren McAndrews

John Tishok

J. Mark Morford

Attachment A (Drums and Weights)



Date: June 2012

Zr Fines Inventory for Clean Harbors Incinerator

ZrFines	inventory for	Clean Harbo
	Total	
	weight -	
Line #	Pounds	Profile #
1	145	1
2	155	1
3	147	1
4	145	1
5	150	1
6	140	1
7	153	1
8	200	2
9	124	1
10	139	1
11	155	3
12	155	3
13	155	3
14	155	3
15	155	
16	155	1
17	155	3 3 3 1 2
18	155	
19	155	1
20	155	1
21	155	3
22	155	3 3 3 3 1
23	155	3
24	155	3
25	155	3
26	155	
27	180	1
28 29	155 131	1
		1
30 31	165	
32	195	
33	154	
34	255 238	2
35	140	
36	155	2 2 1 2 2 1 3 3 3 3 3 2
37	155	2
38	155	
39	155	3
40	155	3
41	255	2
	200	

1 Zr Fines & Other	CH 1205121
2 Zr Fines w/filter paper	CH 1205121-1
3 Honing Sludge	CH 561515
4 Rotoclone Sludge	CH 566614
5 Floor Sweepings	CH 561/03

42	147	
43	141	1
44	155	
45	154	
46	166	2
47	155	
48	155	3
49	155	3
50	155	
51	155	
52	255	1
53	155	
54	150	1
55	249	2
56	155	1
57	143	1
58	155	1
59	125	1
60	155	1
61	153	1
62	215	2 1
63	154	
64	155	1
65	140	1
66	155	3 3 3 3 2 1
68	155	3
69	155	3
70	155	<u></u>
71	155	3
72	243 140	
73	155	1
74	255	
75	155	5
76	241	
77	195	
78	147	
79	203	
80	141	1
81	155	3
82	155	3
83	155	3
84	155	2 5 2 2 1 2 1 3 3 3 3 3 3 3 3 3 3
85	155	3
86	155	3
87	155	3
88	155	3
89	155	3
90	155	3

1 Zr Fines & Other	CH 1205121
2 Zr Fines w/filter paper	CH 1205121-
3 Honing Sludge	CH 561515
4 Rotoclone Sludge	CH 566614
5 Floor Sweepings	CH 561493

91	155	
92	131	1
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94	149	1
95	153	1
96	155	3
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98	155	3
99	155	3 3 1
100	155	3
101	130	
102	155	1
103 104	143	1
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103	155	1
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107	155	3
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111	155	
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123	155	3
124	155	3 3 3
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126	151	
127	147	1
128	151	1
129	155	1
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1 Zr Fines & Other	CH 1205121
2 Zr Fines w/filter paper	CH 1205121-1
3 Honing Sludge	CH 561515
4 Rotoclone Sludge	CH 566614
5 Floor Sweepings	CH 561493

	140	149	
	141	131	
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	145	140	
	146	238	2
	147	118	
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	186	146	1
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1 Zr Fines & Other	CH 1205121
2 Zr Fines w/filter paper	CH 1205121-1
3 Honing Sludge	CH 561515
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189	155	
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199	137	1
200 201	143	
202	155	3
203	155	3 3 3
204	155	3
205	155 155	
206	147	<u>3</u>
207	143	1
208	155	1
209	155	1
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211	152	1
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213	130	1
214	155	1
215	149	1
216	130	1
217	145	1
218	135	1
219	113	1
220	136	1
221	155	3
222	155	3
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1 Zr Fines & Other	CH 1205121
2 Zr Fines w/filter paper	CH 1205121-1
3 Honing Sludge	CH 561515
4 Rotoclone Sludge	CH 566614
5 Floor Sweepings	CH 561493

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251	155	1
252	140	1
253	135	1
254	187	2
255	151	1
256	155	1
257	151	1
258	155	1
259	155	1
260	155	1
261	155	3
262	155	3 3 3 3 2
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1 Zr Fines & Other	CH 1205121
2 Zr Fines w/filter paper	CH 1205121-1
3 Honing Sludge	CH 561515
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	296	140	
	297	155	1
	298	155	1
	299	144	1
	300	155	1
	301	255	2
	302	255	2
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	304	255	2
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	325	155	3
	326	215	2
	327	236	2
	328	225	
	329	255	2
	330	255	2
	331	126	1
	332	255	2
	333	155	1
	334	130	3 3 3 3 3 2 2 2 2 2 1 2
	335	215	2

1 Zr Fines & Other	CH 1205121
2 Zr Fines w/filter paper	CH 1205121-1
3 Honing Sludge	CH 561515
4 Rotoclone Sludge	CH 566614
5 Floor Sweepings	CH 561493

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338		1
339		
340		
341		2
342	222	2
343		2
344	240	2 2
345	234	2
346	140	
347	150	1
348	130	1
349	140	1
350	152	1
351	245	2
352	195	2
353	225	2
354	205	2
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1 Zr Fines & Other	CH 1205121
2 Zr Fines w/filter paper	CH 1205121-1
3 Honing Sludge	CH 561515
4 Rotoclone Sludge	CH 566614
5 Floor Sweepings	CH 561493

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1 Zr Fines & Other	CH 1205121
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3 Honing Sludge	CH 561515
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5 Floor Sweepings	CH 561493

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1 Zr Fines & Other	CH 1205121
2 Zr Fines w/filter paper	CH 1205121-1
3 Honing Sludge	CH 561515
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3 Honing Sludge	CH 561515
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1 Zr Fines & Other	CH 1205121
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CH 1205121
CH 1205121-1
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Attachment B (Manifest Copies)

	Ple	ase print or type. (Form designed for use		614447701			W 3/3/	2011	For	m Approved	i. OMB No	2050-00
	↑	UNIFORM HAZARDOUS 1. Generator		2. Page	1 of 3. En	nergency Respo	onse Phone	4. Manifesi	t Tracking I	919	res	2. 2000 00.
		WASTE MANIFEST () (S (1)) 5. Generalor's Name and Mailing Address	050955848	1_	10	3001403	33718	UU	532	919	· (FLE
,	l	With Chang			Gener	ator's Site Addr	ess (if different	than mailing addre	ess)			
		1600 Old Salem Road No	Ð									
		Albany, OR 97321	•	•	. 54	AME			•			
		Generator's Phone: 8. Transporter 1 Company Name		· · · · · · · · · · · · · · · · · · ·								
Í		Clean Harbors Environme	antal Paul San 3					U.S. EPAID			·	
		7. Transporter 2 Company Name	Surgi Stat Alber 1110				<u> </u>	III 八百	0039	3022	250	
		7. Honsporter 2 Company Hanse						U.S. EPA ID I	Number			
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- 1		Clean Harliors El Dorado						U.S. EPAID	Number			
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		El Daredo, AR 71700 Facility's Phone: (670) 06	to arms					,				
ł					 							
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									u exhost ខាង	pareau arku ra	in teo Pema	ary
	10	I certify that the waste minimization statem Senerators/Offeror's Printed/Typed Name	ent identined in 40 CFR 262.27(a) ((if I am a large quantity g	enerator) or Signature	(b) (if I am a sn	na'l quantity ger	verator) is true.				
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-	+	6. International Shloments				· · · · · ·			· :		7/16	12
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		ransporter signature (for exports only): 7. Transporter Acknowledgment of Receipt of Ma	eteria's			Date lear	ving U.S.:					
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E	18	b. Alternate Facility (or Generator)				THE OUT TO SO THE	o Hombon.	U.S. EPAID No	mber			
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금	Fa	cility's Phone:						1				1
冒	18	c. Signature of Alternate Facility (or Generator)					112.1	<u> </u>		Mont	lh Day	Year
DESIGNATED FACILITY	_											
Š	19.	Hazardous Waste Report Management Method	d Codes (i.e., codes for hazardous	waste treatment, dispos	al, and recyc	≱ing systems)						'
	1.	H040	2. H04Q	3,	11040			4.		· · -		
PI		Debug in the control	<u></u>									Ī
١.,	۲U. Pr	Designated Facility Owner or Operator: Certific ted/Typed Name	ation of receipt of hazardous mater			as noted in Iten	n 18a					
	- 111			S	gnature	•				Monti	n Day	Yea:
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	For	m 8700-22 (Rev. 3-05) Previous editions	ara abastata					 .				<u> </u>

Pie	1 —	rint or type. (Form desig	ned for use of 1. Generator li		ewriter.)	11182-00			લ કાંગ્ય		For	m Approve	d. OMB No.	2050-00
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	7. Tr.	ansporter 2 Company Nam	9						· · · · · · · · · · · · · · · · · · ·	U.S. EPAID		1388	2 D U	
	0 3 E	esignaled Facility Name and Llean Harbers Et 109 American Ch 1 Ourado, AR 71 itys Phone:	Dorado Li ole							U.S. EPAID		148	192	\$ 10.h
	9a. HM	9b. U.S. DOT Descriptio and Packing Group (if a	n (includina Pro		zard Class, ID Number,			10. Conte	iners Type	11. Total Quantity	12. Unit Wt./Vol.	13.	Waste Code	ıs
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18	la. Dis	crepancy Indication Space	Quar	itiy	Туре			Residue		Partial Rejec	tion		Full Rejec	tion
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20. Prír	Desig	nated Facility Owner or Op	erator: Certifica	tion of receipt of hazard	lous materials covered I			s noted in Item	18a				,	
			2715			Signatu	re	•				Moat	h Day	Year
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Please print or t	ype. (Form desig	ned for use on elite (12-pitch) type	ewriter.) (34.6-4-	47733-HH,		報 3/3/		For	m Approve	d. OMB No	. 2050-00
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18b. Alternate Fa	cility (or Generator)				mifest Reference	Number:	U.S. EPA ID Nu	mber	· · · · · · · · · · · · · · · · · · ·		
Facility's Phone: 18c. Signature of	Alternate Facility (o	r Generalor)					<u>L</u>		Moni	h Day	Year
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19. Hazardous W	aste Report Manage	ement Method Codes (i.e., codes for ha	azardous waste treatm	ent, disposal, and recy	ding systems)					<u>l</u>	
1. Н040		2 11040		3. 11040			4.		···	-t·	
20. Designated Fa	ectify Owner or Ope	erator: Certification of receipt of hazardo	ous materials covered	by the manifest except	as noted in Item	18a					
Printed/Typed Nar	m e			Signature				··	Month	Day	Year
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1	į v	FORM HAZARDOUS VASTE MANIFEST	1	lumber 5025584	8	1	B00) 483	9718			JUB JUB	7 F	LE
	1 3	energtor's Name and Maili Walt Chanus 1,600 Old Saferm Minney, OR 973:	Rond No				rator's Site Addre	ess (if different t	han malfing addre	955)	····		
	6. Tr.	erator's Phone: ansporter 1 Company Nam 310 curring the force to	e Prárkarekská	eristrivatores tech	3- - 11 71 77				U.S. EPA ID	Number	(* *)	, , ,	1
		ansporter 2 Company Nam			,	· · · · · · · · · · · · · · · · · · ·	***		U.S. EPAID		492-E	zov	
	8. De	signated Facility Name an	d Site Address						U.S. EPA ID	Number			
	1 3	signaled Facility Name an 160n Hostborn El 109 American Cl 1 Derado, AR 71	reio .730								748:	192	
	Fac≹	ty's Phone:	(670) 863			····							
	9a. HM	and Packing Group (if a	ny))	r Shipping Name, Hazard			10. Con No.	tainers Type	11. Total Quantity	12. Unit WLVoi.	13.	Waste Codes	3
ATOR -	k	i. RQ, UNGLES (ZIRCONIUM	, waste m Mixture),	ETAL POWDER 4.2, PG II (000 31	, yelf- heati 11.0003)	NG, N.O.5.,	52	DW	11,733	ρ	10001.	0003	
- GENERATOR	x	2 RQ, UN3189 (CONTAINS 7	, waste m inconium	ETAL POWDER), 4.2, PG H (DO	, self-heati (03 D003)	NG, N.O.S.,	37	Dm	5499	ρ	rood	EDOG	
	×	3. HQ, UN3189 AUINOX/ЯІХ)	, <mark>waste m</mark> Mixture),	ETAL POWDER 4.2,PG II (DOC	, selfhean M D003)	180, N.O.S.,	10	DM	1550	P	D001	0003	
	X	4 RO, UN3189 (ZIRCONIUM	, waste m Mixture),	ETAL POWDER 4.2, PG II (DOC	SELF-HEATI IL DOUS)	ING, N.O.S	1	DM	155	P.	D001	0003	
	3 , 4 , 15. (CF112051.2 CH561515 CH561493 SENERATOR'S/OFFEROM marked and labeled/placard exporter, I certify that the co- certify that the waste mink	I I'S CERTIFICATIO led, and are in all r ontents of this cons nization statement	espects in proper conditions in the temperature in	on for trensport accor erms of the attached	rding to applicable in EPA Acknowledgme quantity generator)	lemational and na of Consent	ational governm	rental regulations	Joping name . If export sh	ipment and f	am the Prima	ged, ry
	Genera	ator's/Offeror's Printed/Typ	ed Name	Harman		Signature	70 17.	1 /	,		Mor	ith Day	Year / ?
INT'L		emational Shipments	Import t			Export from U.S.		entry/exit:					<u> </u>
		oorter signature (for export nsporter Acknowledgment		ials			Date lea	ving U.S.;					
ORTE	Transp	oder 1 Printed/Typed Name	e	7 1 1 15 15 13 13		Signature -	3 /1	Jan J	·		Mon	th Day	Year
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두	18. Dis	crepancy									J	L	
	18a. Di	screpancy Indication Space	e Quan	ity	Туре		Residue		Part'al Rej	ection	. [Full Reject	tion
┢	18b. Ait	ernate Facility (or General	or)		· · · · · · · · · · · · · · · · · · ·	h	fanifest Referenc	se Number:	U.S. EPA ID N	lumber			
AGI													
		s Phone: mature of Alternate Facility	(or Generator)								Mo	nth Day	Year
$ \mathfrak{S} $	19. Haz	ardous Waste Report Man	anement Method (Ades lie rades for har	erdouse wasto transfer	and disposed and to	nutas contant						<u> </u>
SH		040		2. HO40	eroous waste death	3. HO 4			4. 14	940			
		gnated Facility Owner or C	perator: Certificat	ion of receipt of hazardou	s materials covered	by the manifest exce	pl as noted in Ite	m 18a	I				
		Typed Name			· · · · · · · · · · · · · · · · ·	Signature				<u>.</u>	Mon	th Day	Year
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1		FORM HAZARDOUS	1. Generator ID			2. Page 1 of	3. Emergency Re	sponse Phone	4. Manifest	Tracking !	lumber		
11		VASTE MANIFEST enerator's Name and Maian	C) R () ()	50955R4	1 <u>fi</u>		troopar	13-371A	100	334	308	y F	<u>-LE</u>
	1	Nah Chang	ig Addices			G	senerator's Site A	ddress (if different t	han mai£ng addre	ss)			
Ш	1 1	600 Old Saleni	Road No				SAME						
П		Mburry, OR 973; erelor's Phone:	21			1	OPHER.						
	6. Tr	ansporter 1 Company Nam							U.S. EPA ID I	Number			
П	(Clean Harbors Ei	nvironmer	ital Servines In	Œ						3322	16 80 14	
	7. Tra	ansporter 2 Company Name	9		<u> </u>		······································		U.S. EPA ID I		<u> 2 (3 8) 5</u>	a uv	
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П		signated Facility Name and		۸.					U.S. EPA ID I	Vumber	·		
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	E	l Dorado, AR 71	730								7 7 6	k =8 K.	
	\vdash		(870) 863						<u>, I</u>	·			
	9a. HM	9b. U.S. DOT Descriptio and Packing Group (if ar	n (ind⊌ding Prop nv}}	er Shipping Name, Haza	rd Class, ID Number,			Containers	11. Total	12. Un't	13	Waste Code	e
	-	ļ		hamie fi i en ad tal tal tal			No.	Туре	Quantity	Wt./Vol.			
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	Х	(ZIRCONIUM	MIXTURE)	. 3.2, PG II (DO	01 8003)	***********	· Ø	DM	Ø	٢		7	
	14. Sp	ecial Handling Instructions	and Additional in	formation			<u></u> ,						
Ш		CH130512-1		erei 136									
		CH120512	+	eng#135									
		CH561515 CH561495		erg#195 erg#1.95									
	15. G	ENERATOR'S/OFFEROR'	S CERTIFICATION	ON: Thereby declare tha	t the contents of this o	consignment are t	fully and accurate	ly described above	by the proper shin	nina name	and are clar	siferi narka	ned .
П		arked and labeled/placarde xporter, I certify that the cor							ental regulations.	f export sh	pment and I	am the Prima	ry
Ш	10	zenny that the waste minimi	ization statement	Identified in 40 CFR 262	2.27(a) (if I am a large	quantity generate	ment of Consent, of (b) (if I am a	small quantity gen	erator) is true.				ļ
	Genera	tors/enerors Printed/Type	o Name	<u> </u>		Signate		7 1	,		Mor	th Day	Year
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1	8b. Alte	mate Facility (or Generator)			<u> </u>			U.S. EPA ID Nu	mber			
		Phone:											į
	ov. Sign	nature of Alternate Facility (or Generator)								Mor	ካ Day	Year
L	h 11-	down think to											
11.		rdous Waste Report Manag	ernent Method C	2	ardous waste trealme	ent, disposal, and	recycling system	5)				-	
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L 20) Desin	nated Facisty Comer or Co	aralan Cariforn	an of rocatal of Court									
Pi	inted/Ty	nated Facility Owner or Op ped Name	CIAIOI. CERRICSE	on or receipt or nazaroot	is materials covered b	oy the manifest ex Signature		tem 18a			1/2-	5 P	
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Î	WASTE MANIFEST 5. Generator's Name and Maling	ORD 05 0 9 5 5	848		(800) 483	19718	4. Manifes	Tracking!	908	5	F
	Woh Chang 1500 Old Salom! Albany, OR 9732	Stand No			nerator's Site Addin SAME	ess (if different t	than mailing addin	ess)			
	Generator's Phone: 6. Transporter 1 Company Name Glosoft Harborn En	ivironmental Services	a bas				U.S. EPA ID	Number			
	7. Transporter 2 Company Name		3 IXXV			1 ,	U.S. EPA ID		3323	250	
	8. Designated Facility Name and Close II Harry or DE I	Site Address		****			U.S. EPA ID	si			
	El Deredo, AR 71	Ci o							348	192	
	ga. 9b. U.S. DOT Description	(including Proper Shipping Name, i	Hazard Class, IO Numbe	37,	10. Con	lainers	11. Total	12, Unit	T		
 	1. NQ, UNGERS,	WASTE METAL PUWE	den, self-hea	MNG, N.O.S.,	No.	Туре	Quantity	Wt./Vol.		Waste Cod	
SECRETARION OF		MIXTURE), 4.2, PG II (1/	DW	2323	P	0.763	15000	ŀ
2	X (CAMININS)	Waste Metal Powe Roonium, 4.2, Pg II	(0001.0003)		40	D.M	3146	P	DOOL	D0 03	
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	X 4. RQ UN3189, (ZIRCONIUM) 14. Special Handling Instructions a	Waste Metal Powi Mixture), 4.2, PG II (DER, SELF-HEA DOOL DOOS)	TING, N.O.S.,	3	DM	465	7	0003	D003	
ļ	I certify that the waste minimiz	6 CERTIFICATION: I hereby declar d, and are in all respects in proper o tents of this consignment conform to tation statement identified in 40 CFF	o the terms of the attache	coroing to applicable in ed EPA Acknowledomi ge quantity generator)	itemational and na	ibonal governme	ental regulations.	pping name, If export shi	, and are class pment and to	sified, pack am the Prima	эge ary
L	Generator st Officer s Printed Typed	Name , ,		Signature	• ee	٠ و	7		Mor	•	
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	17. Transporter Acknowledgment of i fragsporter 1 Printed/Typed Name	Receipt of Malerials		S'gnature	Z/J	1 1			Men	. De.	
]	Transporter 2 Printed/Typed Name	DURHAM	<u> </u>	Signature	where s	or level	indie-	Manager	10	7109	
L				J					Mon	lh Daÿ	ı
-	8. Discrepancy 8a. Discrepancy Indication Space	Quantity	Туре		Residue		Partial Reje	ction		Fuil Reje	clo
10	8b. Alternate Facility (or Generator)			<u> </u>	danifest Reference	Number:	U.S. EPA ID Nu	mber			
	acility's Phone: 8c. Signature of Allemate Facility (o	r Genera'or)					<u> </u>		Mon	ih Day	
	. Hazardous Waste Report Manage	ement Method Codes (i.e., codes fo	r hazardous waste treatr	ment, disposal, and re	cycling systems)					ــــــــــــــــــــــــــــــــــــــ	L
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19		i		I I		100					_
1.	Designated Facility Owner or Ope	rator: Certification of receipt of haza	ardous materials covered		pt as noted in Item	1 108					_
19 1. 20 Pri	Designated Facility Owner or Ope inted/Typed Name orm 8700-22 (Rev. 3-05) Previo		ardous materiais covered	d by the manifest exce Signature	pt as noted in item	1 108			Mont NERATOR		L

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	Wah Chung			Gener	ator's Site Addr	ess (if different	than mailing addre	ess)		<u> </u>	
	1600 Old Sulon Read Albany, OR 97321	d Ro		\$\$	ame						
	Generator's Phone: 6. Transporter 1 Company Name						:				
	Clean Harborn Environ	nmental Services i	lno _{jet}				U.S. EPAID 徐春!		322	250-	
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	El Dorndo, AR 71730 Facilitys Phone: (870)) 863-7173					1				
	ga 9b. U.S. DOT Description (includ		azard Class, ID Number,	···	10. Con	Mainers	11. Total	12. Unit			
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	2 RQ, UN3189, WAS (CONTAINS XIRGO	STE METAL POWD	er, self-heati	NQ, N.O.5.,					0001	0003	
Ĭ		16.43			77	DW	11,239	P			
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	A RO UNGLES, WAS KINCONIUM MIXT	STE METAL POWE	er, selfheati	NG, N.O.S.,		+			D 001	D003	
	Z CHACCAHAMIXI	nue), 4.2, FG II (D	001 0003)	•	3	DW	405	P			
	14. Special Handling Instructions and Add 1. CH120512-1 2. CH120512	ERG#135 ERG#135			<u> </u>			<u></u>		1	
-	3.CH561515 4.CH561493	ERG#135 ERG#135									
Π"	or ornerotion profreston 9 rekt	IITIGATION: Thereby declare	that the contents of this c	onsignment are fully a	nd accurately d	escribed above ational governm	by the proper ship ental regulations. I	oping name, if export ship	and are clas oment and I a	sified, packag	ed, y
	 GENERATOR'S/OFFEROR'S CERT marked and labeled/placarded, and a Exporter, I certify that the contents of I certify that the waste minimization s 	f this consignment conform to t	he forms of the offerhad t	Desg to approaise inte	mavonai and na					am the Primar	
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SHEWCZYK Susan

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FULLER Brian

ent:

Monday, July 30, 2012 4:05 PM

To:

SHEWCZYK Susan

Subject:

FW: Transportation of Zr Swarf Drums

FYI

From: Weber, Lee [mailto:Lee.Weber@ATImetals.com]

Sent: Tuesday, July 24, 2012 9:18 AM

To: FULLER Brian; DUVAL Rich

Subject: Transportation of Zr Swarf Drums

Brian and Rich,

A quick email to let you know the tentative schedule (transportation across the US is not an exact science) for shipment of the Zr Swarf drums from WTI and ATI PF. The ATI PF drums were picked up in PA on Saturday evening (July 21, 2012). We expect them to arrive at CWMNW by Wed or Thurs (7/25 or 7/26). The WTI drums are scheduled to be picked up on Wednesday morning (7/25) with a drive team to have them at CWMNW Friday afternoon (7/27) or Monday morning. As discussed with CWMNW and Rich we intend to begin treatment on Tuesday morning (7/31). Please let me know if you have any questions or comments. Thanks.



Lee Weber Director, EH&S

Allegheny Technologies Incorporated Primary Metals and Exotic Alloys 1600 Old Salem Road Albany, Oregon 97321 www.ATImetals.com

T: 541-812-7063 F: 541-924-6874

Please visit ATI's all-new website: www.atimetals.com

SHEWCZYK Susan

দrom:

Morford, J. Mark [JMMORFORD@stoel.com]

ent:

Monday, June 18, 2012 5:34 PM

To:

SHEWCZYK Susan

Cc:

John Matson (matson.john@epamail.epa.gov); McAndrews, Lauren; Denham, Jim; Tishok,

John M.; Weber, Lee

Subject: Attachments: Response to DEQ information request 2012-06-18 Letter to Susan Shewczyk pdf

Susan,

Attached is our letter on behalf of Wah Chang in response to your request for information dated April 13, 2012. The original of this letter, together with the responsive documents on CD is being sent to you by overnight delivery (regular mail to cc's).

Mark

J. Mark Morford

STOEL RIVES LLP | 900 SW Fifth Ave, Suite 2600 | Portland, OR 97204-1268 Direct: (503) 294-9259 | Mobile: (503) 319-1973 | Fax: (503) 220-2480 | immorford@stoel.com | www.stoel.com

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